

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 22-CV-20917

ENRIQUE MADRINAN,

Plaintiff(s),

vs.

VE RESTAURANT GROUP LLC, 1414
BRICKELL LLC, MIAMI DADE
COUNTY, THE CITY OF MIAMI,

Defendant(s).

**CITY OF MIAMI'S NOTICE OF
REMOVAL OF ACTION FROM STATE
COURT**

_____/

COMES NOW the DEFENDANT CITY OF MIAMI ("CITY"), by and through undersigned counsel, and pursuant to Title 28 U.S.C. § 1441, et. seq., and hereby gives notice of removal of this cause by the filing and service of this notice and states:

1. On March 18, 2022, the Plaintiff served the CITY a pleading filed in Miami-Dade Circuit Court, Case No. 2022-004521-CA-01.
2. The above-referenced complaint was the first receipt by the CITY of a pleading from which it could be ascertained that the case is one which has become removable, as it sets forth purported claims in Count VII of the complaint against the CITY arising under Title II of the Americans with Disabilities Act (42 U.S.C. § 12131) and Section 504 of the Rehabilitation Act (29 U.S.C. § § 701-708, § 794).
3. Copies of all process, pleadings and orders served upon the Defendant in the action being removed are attached hereto (as an exhibit) in accordance with 28 U.S.C. § 1441(a).
4. The Civil Cover Sheet is also attached hereto as an exhibit.

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By: /s/ **Stephanie K. Panoff**
Stephanie K. Panoff,
Assistant City Attorney
Florida Bar No. 69214

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of March, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ **Stephanie K. Panoff**
Stephanie K. Panoff,
Assistant City Attorney
Florida Bar No. 69214

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